

**FILED**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JUL 10 2008 *aw*  
Jul 10, 2008  
MICHAEL W. BOBBINS  
CLERK, U.S. DISTRICT COURT

CORNELIUS DONALD WINFREY #B03797

PLAINTIFF

VS.

COOK COUNTY DEPT. OF CORRECTIONS

MAIL ROOM HANDLERS

DEFENDANTS

HONORABLE JUDGE  
JOHN W. DARRAH

#08C1982

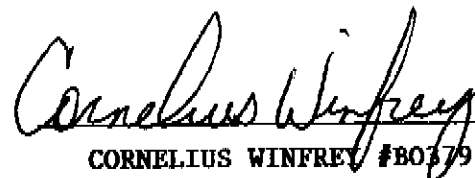
08cv1982

MOTION TO COMPEL DISCOVERY TO AVOID PROCEDURAL DEFAULT

NOW COMES PLAINTIFF CORNELIUS WINFREY, PROSE, MOVING THIS HONORABLE COURT TO COMPEL DEFENDANT'S TO RETURN NAMES OF APPLICABLE DEFENDANT RELEVANT TO THESE INSTANT PROCEEDING, TO AVOID A (ANY) PROCEDURAL DEFAULT WHERE SUCH KNOWLEDGE AND INFORMATION IS WITHIN THEIR POSSESSION AND WITHOUT WHICH PLAINTIFF WILL BE PREJUDICED. IN SUPPORT THEREOF PLAINTIFF STATES AS FOLLOWS

- 1 plaintiff is presently embroiled in controversy in his attempts to demonstrate that defenants at all times relevant, knew of the substantial risk, and took no action to prevent his substantial injury by corrective process.
- 2 Plaintiff maintains that on ( JAN 17, 2008 ), Communication letter was directed to the county corrections, Division, C/O Both director of division one (1) or deseguate and social worker dean, At 2600 so California Chicago Illinois 60608, In accordance with appicable local rule 3.3 et, seq of united states District court, Northeastern Division Illinois, Requesting completeion and production of certain documents.
- 3 A copy of said letter are hereby attached as, Exhebits (A) and (B), and Incorporated herein.
- 4 Plaintiff remains without a (any) response whatsoever regarding answer to questions from both directors of division one (1) County jail or social worker Dean, And will be irreparably prejudiced W/O this request for compliance with requested information that is part of their daily records at jail.

I CORNELIUS WINFREY SWEAR UNDER PENALTY OF PERJURY I SERVED ALL THE ATTACHED DOCUMENTS TO DANIEL J, FAHLGREN ASSISTANT STATE'S ATTORNEY CIVIL ACTION BUREAU.500 RICHARD J, DALEY CENTER CHICAGO, ILLINOIS 60602 (312) 630-3304 #6201163

A handwritten signature in cursive script, reading "Cornelius Winfrey", written over a horizontal line.

CORNELIUS WINFREY #B03797

PINCKNEYVILLE C.C.

P.O. BOX 999

PINCKNEYVILLE, ILLINOIS

62274-0999

5/13/08

5 Plaintiff cites as authority for this request both federal R. Criminal proc.  
Rule 16, Citing BRADY V. MARYLAND  
373 US. 83, 10. 1. ed 2d 215, 83 s. ( CT 1194) (1963) And it's progenies  
for proposition against withholding by state of exculpatory' Documents  
and respectfully moves for this honorable court issue & direct that an order  
compelling production of mail room supervisor and the mail room handelers,  
Division one (1) Cook County department of corrections,  
Forthwith.

WHEREFORE BASED ON THE FOREGOING IT IS ORDERED THAT THE REQUEST FOR THE  
NAMES OR THE IDENTITY OF ADDITIONALS DEFENDANTS BE RETURNED TO PLAINTIFF  
AT HIS PRISON ADDRESS .

  
Cornelius Winfrey

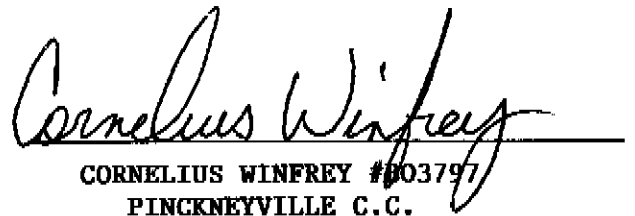
Reg # B-03797

PO. BOX 999

Pinckneyville Illinois 62274

5/13/08

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CORNELIUS WINFREY #003797

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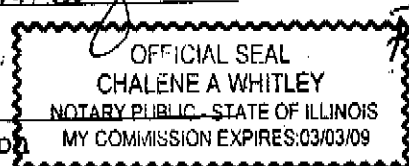
## AFFIDAVIT

I, Cornelius Winfrey, being duly sworn do repose and state that the attached motion to Compel is true and correct in substance and fact to the best of my knowledge.

Subscribed and sworn to before me this  
day of July 7th, 2008.

Notary Public

Expiration of Commission



Cornelius Winfrey  
Petitioner

# B03797

Pine Knewville Correctional Center

PO BOX 999

Pine Knewville, Illinois 62274

Clerk of the U.S. District Court NOTICE OF FILING

TO: PRISONER CORRESP. TO: \_\_\_\_\_

519 SOUTH  
DEARBORN STREET  
CHICAGO, ILLINOIS  
60604

TO: \_\_\_\_\_

Please take notice on July 7th, 2008, I filed with United States  
District Court the attached motion to, Compel  
copy(ies) of which are served on you.

Cornelius Winfrey

## AFFIDAVIT OF SERVICE

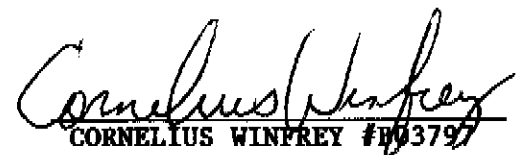
STATE OF ILLINOIS )

COUNTY OF PERRY)

I, Cornelius Winfrey, being sworn state that I served the attached notice on the above named person(s) by placing a true and correct copy in an envelope(s), addressed as shown above, with the proper U.S. postage on each and deposited the envelope(s) in the U.S. Mail at Pine Knewville, Illinois, 62274, on or about the hour of July 7th, 2008.

Cornelius Winfrey

I CORNELIUS WINFREY, SWEAR UNDER PENALTY OF PERJURY THAT I SERVED ALL THE ATTACHED DOCUMENTS TO DANIEL J, FAHLGREN ASSISTANT STATE'S ATTORNEY CIVIL BUREAU 500 RICHARD J, DALEY CENTER, CHICAGO, ILLINOIS 60602 (312)630-3304 #6201163

  
CORNELIUS WINFREY #0379  
P.O. BOX 999  
PINCKNETVILLE, ILLINOIS  
62274-0999  
7/3/08